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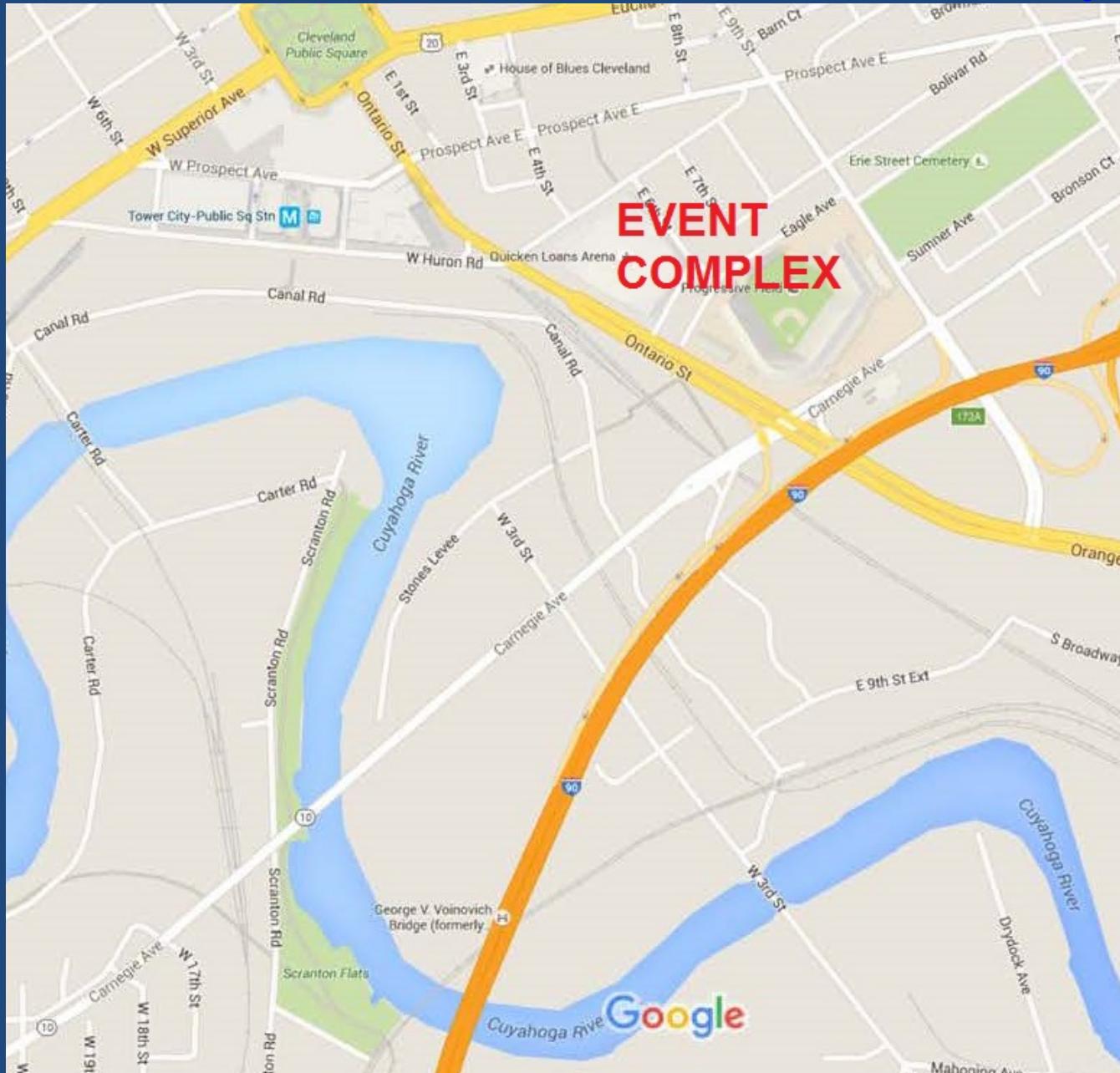
Parade Route and Public Access

2016 Republican National Convention
Cleveland, Ohio



It is the policy of the City of Cleveland that persons and groups have the right to organize and participate in peaceful parades . . . on the streets and public grounds of the City, subject to reasonable restrictions designed to protect public safety, persons and property, and to accommodate the interest of persons not participating in the assemblies to use the streets and sidewalks to travel to their intended destinations, and use public grounds for their intended purposes.

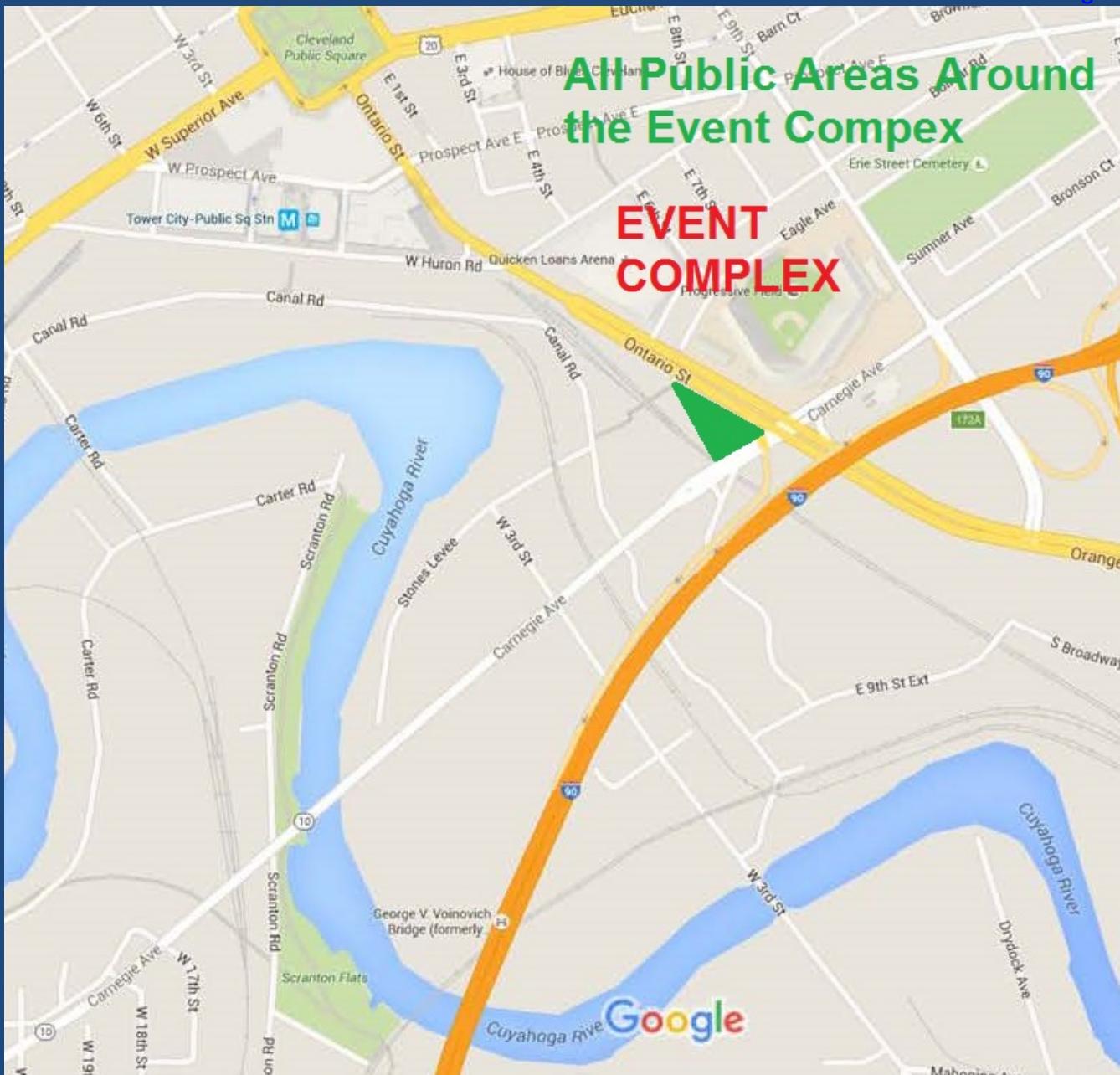
- Cleveland Codified Ordinances § 411.05(f)



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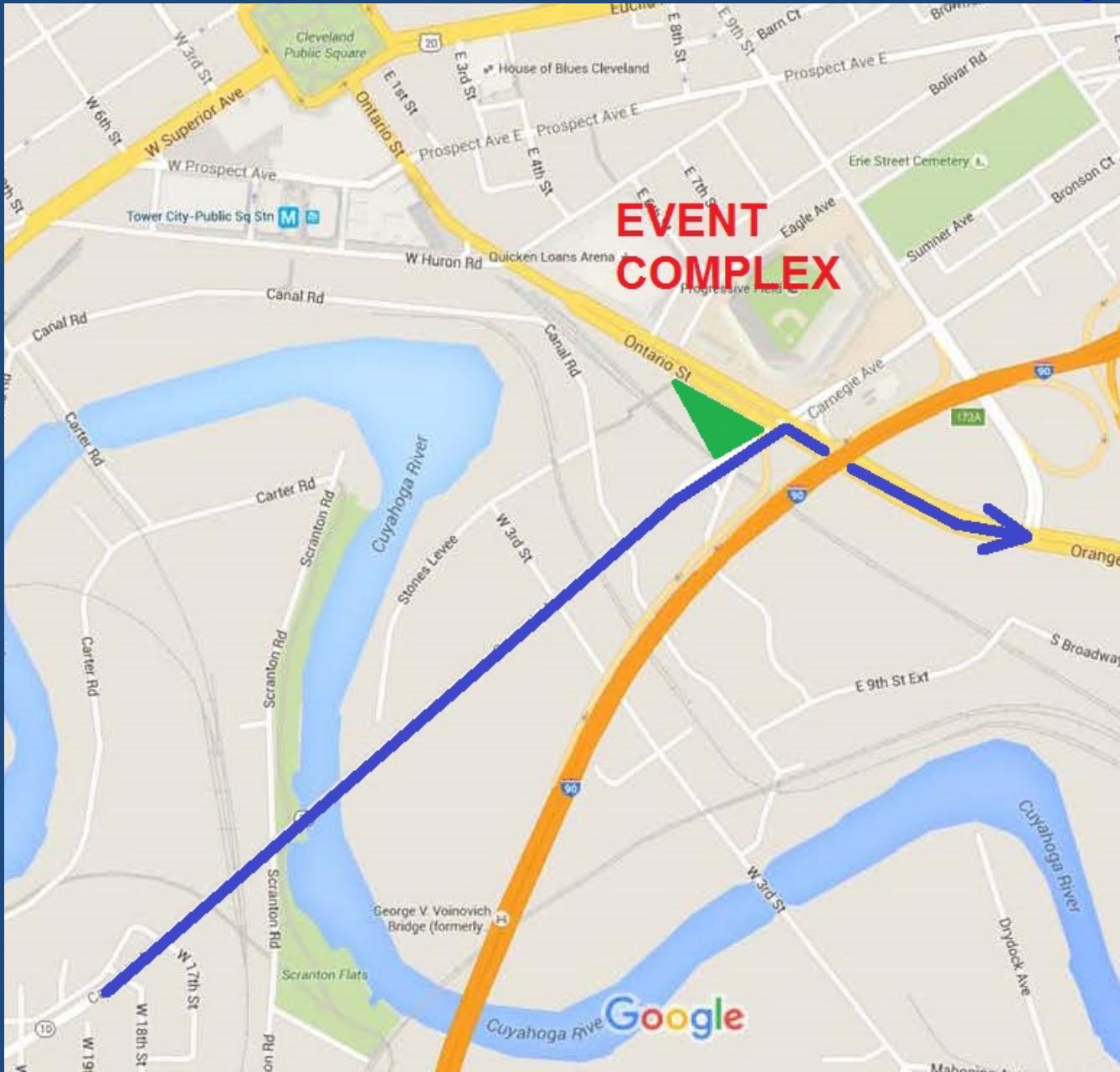
All Public Areas Around the Event Complex

EVENT COMPLEX



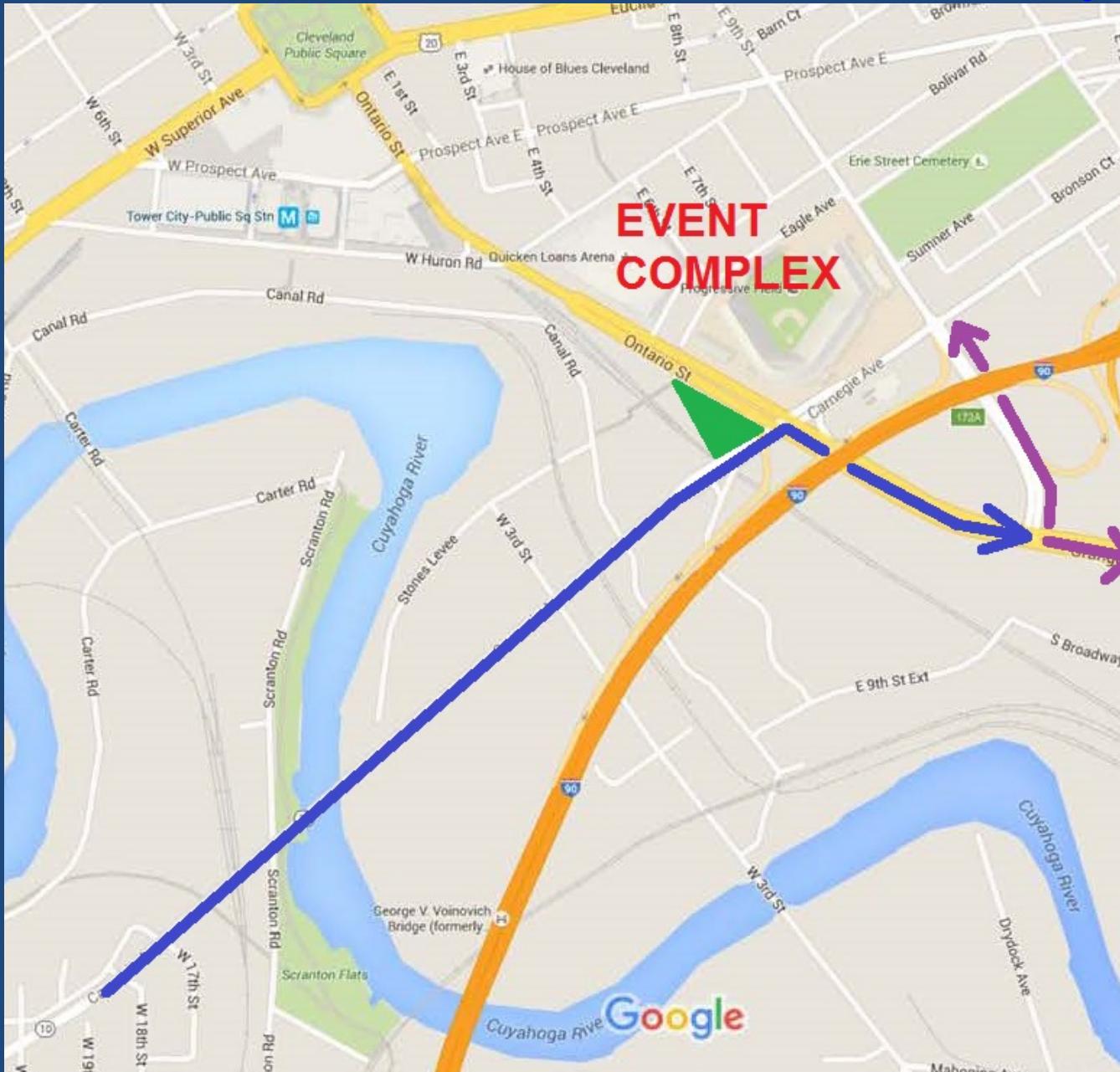
Public Viewing Areas:

- The “Triangle” at Ontario St. and Carnegie Ave.
- Public Areas Around the Event Complex
- 1st Amendment Activity Not Restricted to a Designated Area



Parade Route:

- Starting at Carnegie Ave. near W. 20th St.
- Terminating at Orange Ave. and E. 9th St.



Routes from Parade Terminus to Public Viewing Areas:

- E. 9th St. to Prospect Ave.
- Orange Ave. to E. 14th St.

Parade Route Offers Clear Sightlines To Convention

West End of Carnegie Bridge looking toward the Event Complex



Image capture: Oct 2015 © 2016 Google

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Parade Route Offers Clear Sightlines To Convention

East End of Carnegie Bridge looking toward the Event Complex



Image capture: Oct 2015 © 2016 Google

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Parade Route Comes Within 160 Feet of the Event Complex

Carnegie Ave. at Ontario St.



Image capture: Jun 2011 © 2016 Google

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Parade Route

View from the Event Complex



Parade Route

View from a Patio within the Event Complex



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Prime Public Viewing

The “Triangle” near Ontario St. and Carnegie Ave. Looking toward the Event Complex



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Prime Public Viewing

The “Triangle” near Ontario St. and Carnegie Ave. Looking toward the Event Complex



View from the Event Complex

Carnegie Bridge and the “Triangle”



View from the Event Complex

The “Triangle” from Ontario Avenue



Prime Public Viewing

East 9th St. looking toward the Event Complex



Image capture: Sep 2009 © 2016 Google

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View from the Event Complex East 9th St. and Eagle Ave.

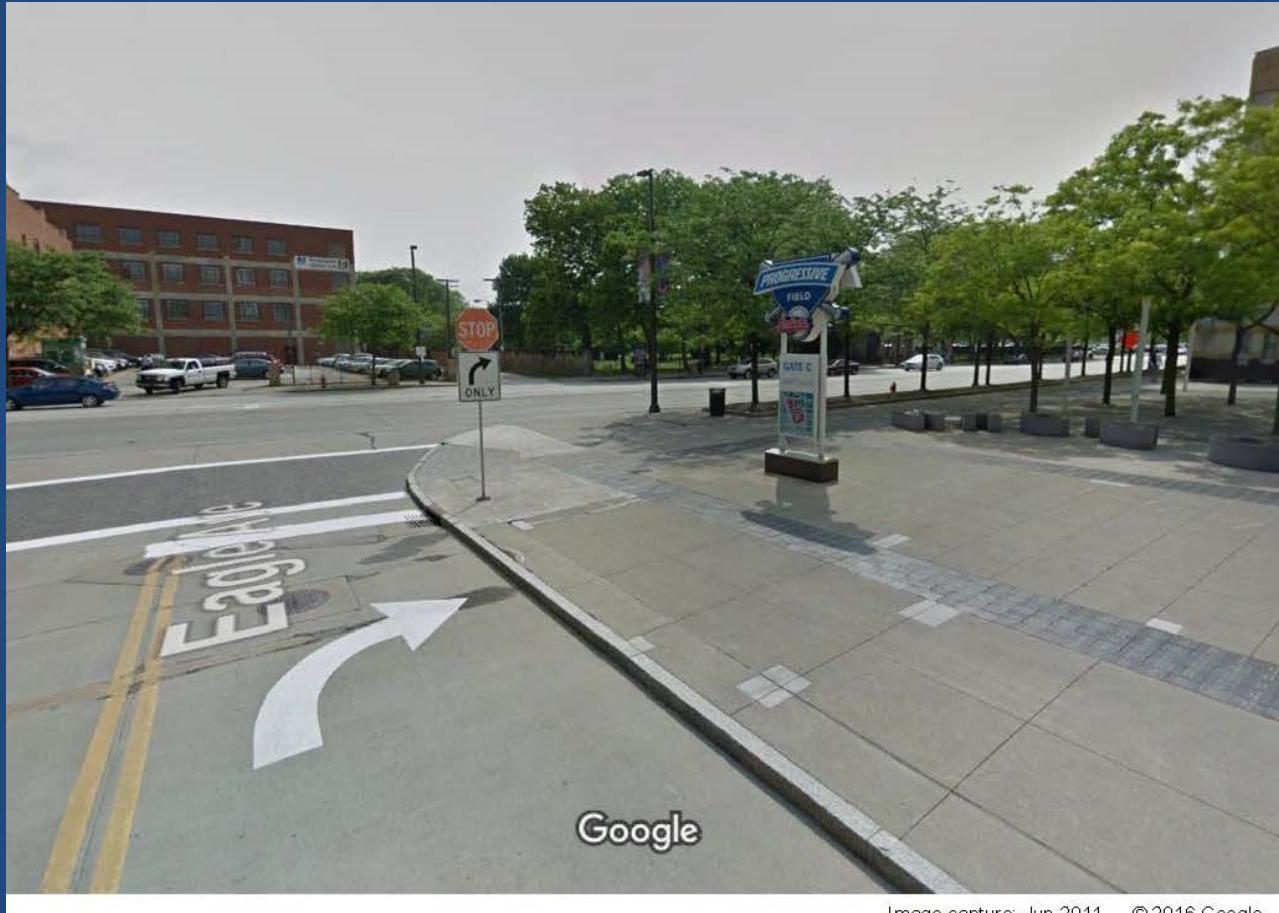


Image capture: Jun 2011 © 2016 Google

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Prime Public Viewing

Prospect Ave. looking toward the Event Complex



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Prime Public Viewing

Prospect Ave. looking toward the Event Complex



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Prime Public Viewing

East 4th St. looking toward the Event Complex



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Prime Public Viewing

E. Huron Rd. at East 7th St. looking toward the Event Complex



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View from the Event Complex

East 4th St. from Quicken Loans Arena



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View from the Event Complex

Prospect Ave. from Quicken Loans Arena



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View from the Event Complex

Prospect Ave. from Quicken Loans Arena



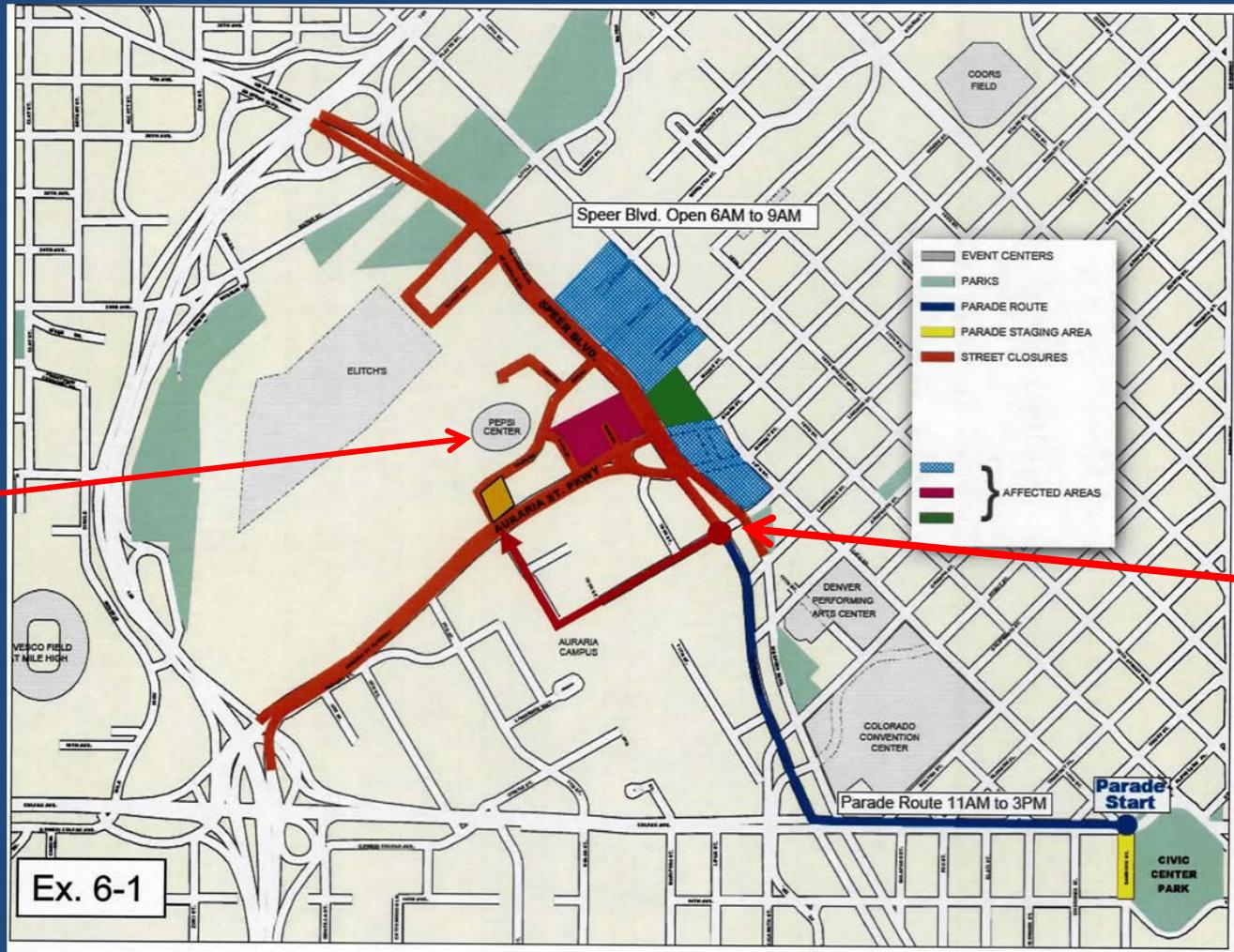
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The Cleveland Parade Route is Superior To Routes That Have Been Approved by the Courts For Other National Conventions

Cleveland Offers Better Access than Most Conventions

	Cleveland (2016)	Tampa (2012)	Charlotte (2012)	Denver (2008)	Boston (2004)	New York (2004)
Closest point of parade to event complex	160 ft	860 ft	950 ft	1200+ ft	780 ft to bldg.; one block to drop-off point for 50% delegates	250 ft
Number of parades during convention	18		18	20		11+
Public limited to specified viewing zone near event?	No	Yes	No	Yes	Yes	Yes
Closest point of public to event complex	300 ft to Arena from E. 4 th St.	450 ft to bldg.	270 ft to building	200 ft to delegate bus stop	600 ft to bldg.	250 ft to some delegates

Denver's 2008 Parade Route Never Came within 1200 Feet of the Pepsi Center



The Cleveland Parade Route Comes Much Closer to the Event Complex than the Denver Parade Route

Cleveland: 160 feet away from the Event Complex



Denver: At least 1200 feet away and out of sight from the Pepsi Center



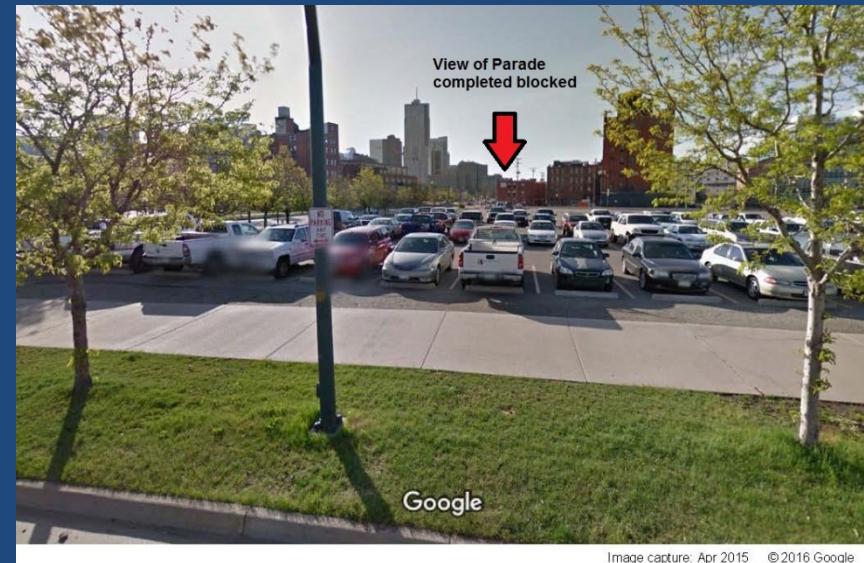
The Cleveland Parade Route Comes Much Closer to the Event Complex than the Denver Parade Route

View of the Parade Routes

Cleveland view from the Event Complex



Denver view from the Event Complex



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The Public Has Much Better Access to the Event Complex than in Denver

Public Viewing of the Event Complexes

Cleveland view from East 4th St.



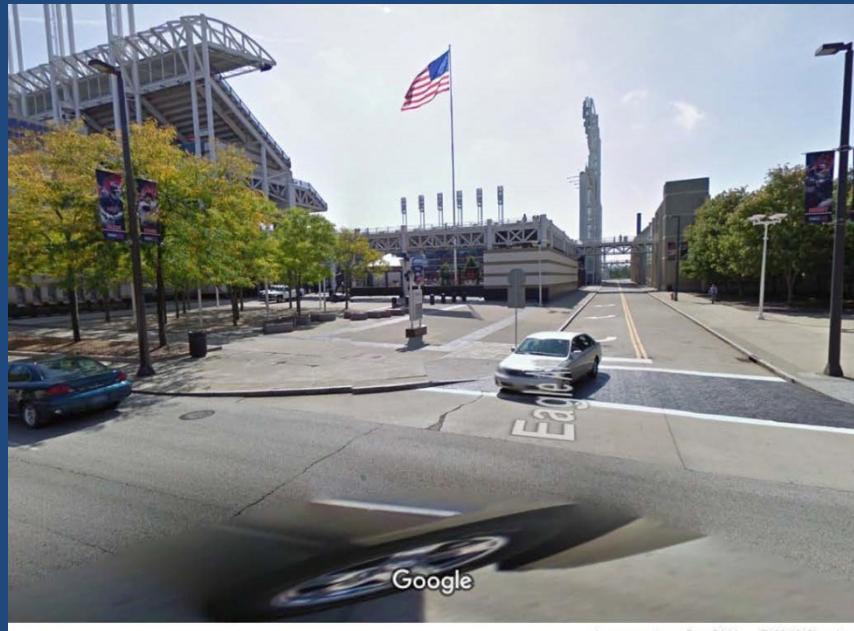
Denver view from the designated “Free Speech” zone



The Public Has Much Better Access to the Event Complex than in Denver

Public Viewing of the Event Complexes

Cleveland view from East 9th Street



Denver view from the designated “Free Speech” zone



The Public Has Much Better Access to the Event Complex than in Denver

Public Viewing of the Event Complexes

Cleveland view from the
“Triangle”

Denver view from the
designated “Free Speech” zone

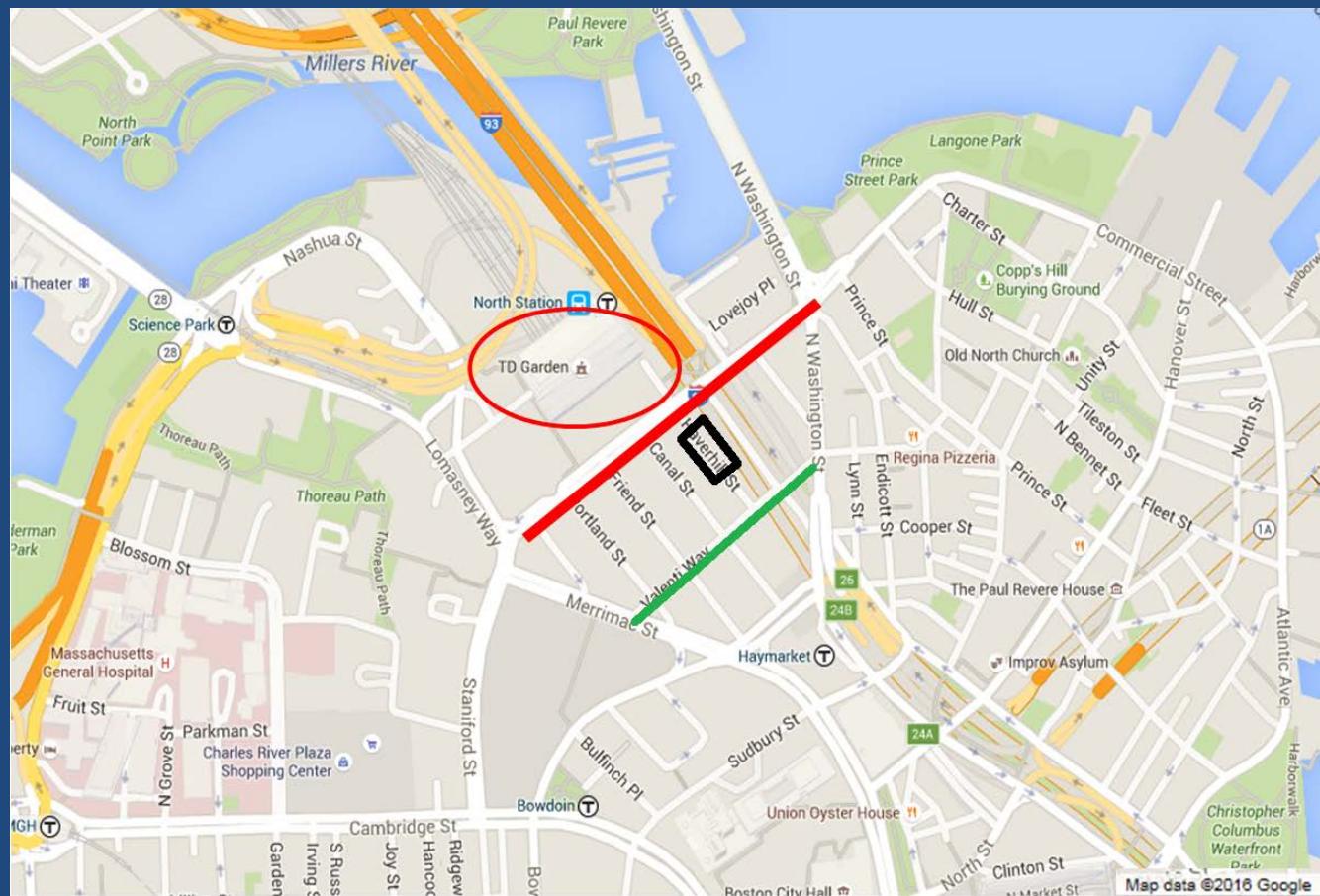


Denver's Parade Route and Public Access Were Upheld by the Court

“[T]he Court finds that the restrictions on access to city streets within and adjacent to the Pepsi Center grounds are narrowly tailored to advance significant governmental interests.”

Am. Civil Liberties Union v. City of Denver, 569 F. Supp. 2d 1142, 1180 (D. Colo. 2008)

Boston's 2004 Parade Route Never Came within 600 Feet of T.D. Garden Arena



The Cleveland Parade Route Comes Much Closer to the Event Complex than the Boston Parade Route

Approximately 160 feet away
from the Event Complex



Over 600 feet away from T.D.
Garden Arena



The Cleveland Parade Route Comes Much Closer to the Event Complex than the Boston Parade Route

View of the Parade Routes

Cleveland view from the Event Complex



Boston view from the Event Complex



Image capture: Jun 2015 © 2016 Google

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The Public Has Much Better Access to the Event Complex than in Boston

Public Viewing of the Event Complexes

Cleveland view from Prospect Ave.



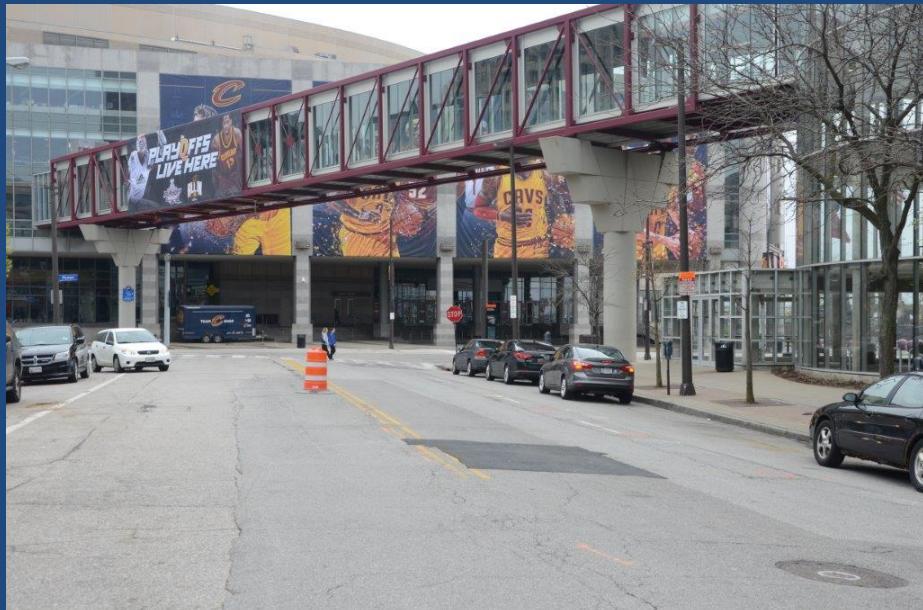
Boston view from the "Demonstration Zone"



The Public Has Much Better Access to the Event Complex than in Boston

Public Viewing of the Event Complexes

Cleveland view from East 4th St.



Boston view from the
“Demonstration Zone”



The Public Has Much Better Access to the Event Complex than in Boston

Public Viewing of the Event Complex

Cleveland view from the
“Triangle”



Boston “Demonstration Zone”



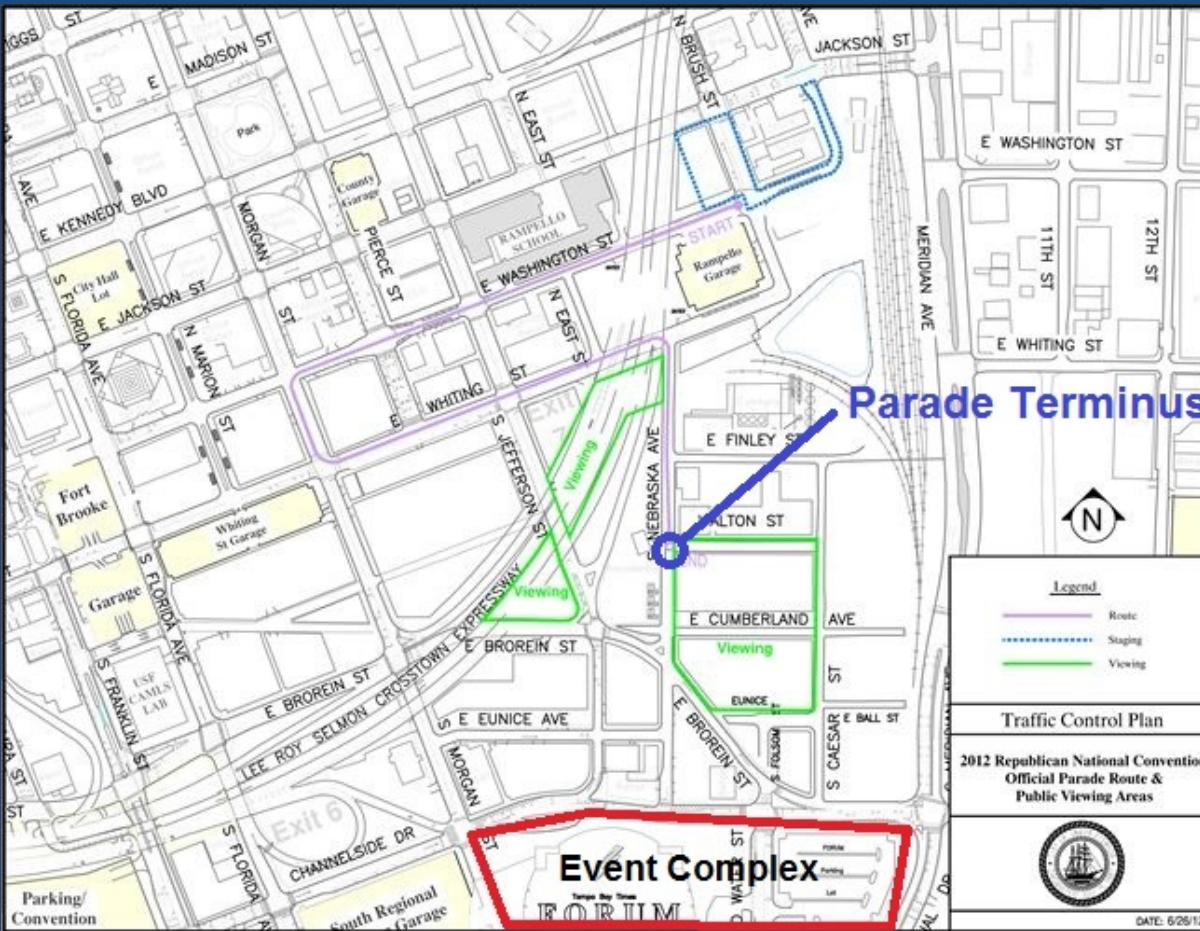
Boston's Parade Route and Public Access Were Upheld by the Court

“[T]here is no injunctive relief that I could fashion that would vindicate plaintiffs' First Amendment rights without causing quite significant harm to the City, the delegates, and the public interest as broadly defined in the form of increased risk to those attending the DNC and further strain on the overtaxed manpower resources of public safety personnel.”

Coalition to Protest the Democratic Natl. Convention v. City of Boston, 327 F. Supp. 2d 61, 76 (D. Mass. 2004)



Tampa's 2012 Parade Route Never Came within 860 Feet of the Tampa Bay Times Forum



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The Cleveland Parade Route Comes Much Closer to the Event Complex than the Tampa Parade Route

Approximately 160 feet away
from the Event Complex



Over 860 feet away from the
Tampa Bay Times Forum



The Public Has Much Better Access to the Event Complex than in Tampa

Case 1:16-cv-01405-JG Document 14-1 Filed 06/20/16 Page 1 of 16 PageID 362

Public Viewing of the Event Complexes

Cleveland view from Prospect Ave.



Tampa view from the closest viewing area at Eunice St.

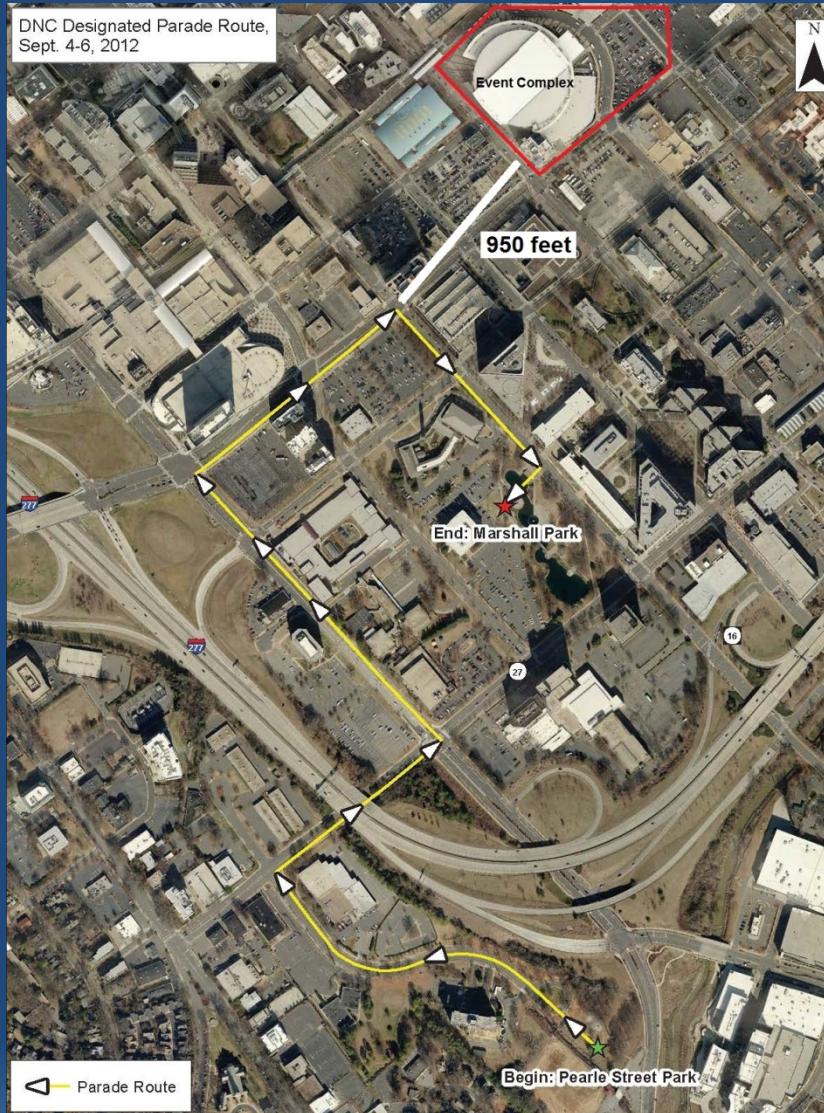


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Tampa's Official Parade Route and Public Access Were Not Challenged in Court.

Charlotte's 2012 Parade Route Never Came within 950 feet of the Time Warner Arena



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The Cleveland Parade Route Comes Much Closer to the Event Complex than the Charlotte Parade Route

Approximately 160 feet away from the Event Complex



Over 950 feet away from the Time Warner Arena



The Public Has Much Better Access to the Event Complex than in Charlotte

Complex than in Charlotte

Public Viewing of the Event Complexes

Cleveland view from Prospect Ave.



Charlotte view from the closest viewing area at N. Brevard St. and E. 6th St.

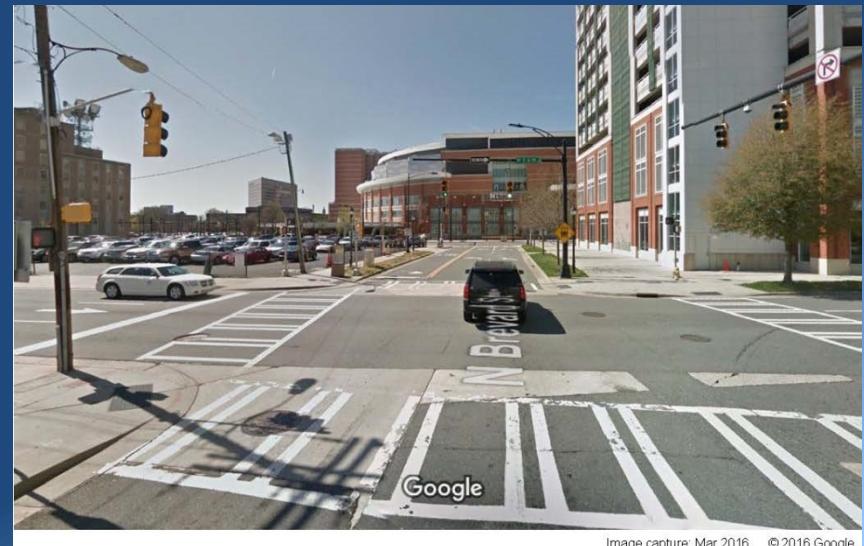


Image capture: Mar 2016 © 2016 Google

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Charlotte's Official Parade Route and Public Access Were Not Challenged in Court.